

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF SOUTH CAROLINA

IN RE: )  
 )  
David Michael Allen, ) CASE NO: 21-02998-jd  
Julie Mckinney Allen, )  
 ) CHAPTER 13  
 )  
DEBTORS. )  
 )  
\_\_\_\_\_ )

NOTICE OF MOTION FOR MORATORIUM

The above-referenced debtors filed papers with the court seeking a moratorium in their payments.

**Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the motion, or you want the court to consider your views on the motion, then within twenty-one (21) days of service of this notice, you or your attorney must:

File with the court a written response, return, or objection at: 1100 Laurel Street  
Columbia, SC 29201

Responses, returns, or objections filed by an attorney must be electronically filed in [ecf.scb.uscourts.gov](https://ecf.scb.uscourts.gov).

If you mail your response, return, or objection to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

You must also send a copy to: Meredith Law Firm, LLC  
4000 Faber Place Drive, Suite 120  
North Charleston, SC 29405

Attend the hearing scheduled to be heard on January 15, 2025, at 10:00 a.m. at the United States Bankruptcy Court, 145 King Street, Room 225, Charleston, South Carolina 29401.

If no response, return, and/or objection is timely filed and served, no hearing will be held on this motion, except at the direction of the judge.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief prior to the scheduled hearing date, if determined to be appropriate.

Date: 12/5/24

Respectfully Submitted,

  
Robert R. Meredith, Jr., DC ID #6152

[rm@meredithlawfirm.com](mailto:rm@meredithlawfirm.com)

Elizabeth R. Heilig, DC ID #10704

[cheilig@meredithlawfirm.com](mailto:cheilig@meredithlawfirm.com)

Meredith Law Firm, LLC

Attorneys for Debtors

4000 Faber Place Drive, Suite 120

North Charleston, SC 29405

P: 843-529-9000

F: 843-529-9907

UNITED STATES BANKRUPTCY COURT  
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MOTION FOR MORATORIUM

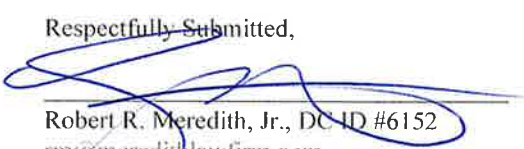
The undersigned, as attorney for the debtors, hereby moves for a moratorium of three (3) months in the debtors' payments to the Chapter 13 Trustee in this matter. Mrs. Allen recently lost her job and the unanticipated reduction in household income left the debtors unable to fund their payments to the Chapter 13 Trustee. The debtors seek this moratorium to allow them to maintain their household bills and living expenses while Mrs. Allen seeks new employment. The debtors are informed and believe that they will be able to resume the obligations pursuant to the confirmed plan of reorganization at the conclusion of the requested moratorium.

Pursuant to 11 U.S.C. § 1329 the debtors' plan of reorganization may be modified upon request of the debtors to: "(1) increase or reduce the amount of payments on claims of a particular class provided for under the plan; (2) extend or reduce the time for such payments; (3) alter the amount of distribution to a creditor whose claim is provided for by the plan to the extent necessary to take into account of any payment of such claim other than under the plan."

Wherefore, the debtors pray that this court issue its order granting the debtors a moratorium in their payments to the Chapter 13 Trustee beginning with the December 2024 payment and including the January 2025 and February 2025 payments, after which the debtors shall resume the payments to the trustee beginning with the March 2025 payment and continue as previously ordered as well as any other relief that this court deems just and proper.

Date: 12/5/24

Respectfully Submitted,

  
Robert R. Meredith, Jr., DC ID #6152

[rmr@meredithlawfirm.com](mailto:rmr@meredithlawfirm.com)

Elizabeth R. Heilig, DC ID #10704

[ehelig@meredithlawfirm.com](mailto:ehelig@meredithlawfirm.com)

Meredith Law Firm, LLC

Attorneys for Debtors

4000 Faber Place Drive, Suite 120

North Charleston, SC 29405

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F: 843-529-9907

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF SOUTH CAROLINA

IN RE:

David Michael Allen,  
Julie McKinney Allen,

DEBTORS.

CASE NO: 21-02998-jd

CHAPTER 13

CERTIFICATE OF SERVICE

I hereby certify that a copy of the within Notice and Motion for Moratorium was duly served upon the parties below named, either by depositing said papers in the United States Mail at Charleston, South Carolina, on this date, with first class postage duly affixed and a return address clearly indicated on said envelope to the address below indicated or electronically through CM/ECF.

VIA US MAIL

[See attached list]

ELECTRONICALLY

James M. Wyman, Esquire  
Chapter 13 Trustee  
PO Box 997  
Mt. Pleasant, SC 29465-0997

US Trustee Region 4  
1835 Assembly Street #953  
Columbia, SC 29201-2448

Date: 12/5/24

  
Kristen E. Buck, Legal Assistant to  
Robert R. Meredith, Jr., DC ID #6152  
[rm@meredithlawfirm.com](mailto:rm@meredithlawfirm.com)  
Elizabeth R. Heilig, DC ID #10704  
[ehelig@meredithlawfirm.com](mailto:ehelig@meredithlawfirm.com)  
Meredith Law Firm. LLC  
Attorneys for Debtors  
4000 Faber Place Drive, Suite 120  
North Charleston, SC 29405  
P: 843-529-9000  
F: 843-529-9907

Label Matrix for local noticing  
0420-2  
Case 21-02998-jd  
District of South Carolina  
Charleston  
Thu Dec 5 14:00:24 EST 2024

Julie Mckinney Allen  
5265 Lenora Dr.  
Summerville, SC 29485-8986

AFS/AmeriFinancial Solutions, LLC.  
Attn: Bankruptcy  
Po Box 65018  
Baltimore MD 21264-5018

American Express National Bank  
c/o Becket and Lee LLP  
PO Box 3001  
Malvern PA 19355-0701

David Michael Allen  
5265 Lenora Dr.  
Summerville, SC 29485-8986

(p)AMERICOLLECT INC  
PO BOX 2080  
MANITOWOC WI 54221-2080

Amex  
Correspondence/Bankruptcy  
Po Box 981540  
El Paso TX 79998-1540

Bon Secours St. Francis Hospital  
PO Box 650292  
Dallas TX 75265-0292

Capital One Auto Finance  
Attn: Bankruptcy  
Po Box 30285  
Salt Lake City UT 84130-0285

Capital One Auto Finance, a division of Capi  
P.O. Box 4360  
Houston, TX 77210-4360

Capital One Auto Finance, a division of Capi  
4515 N Santa Fe Ave. Dept. APS  
Oklahoma City, OK 73118-7901

Child Support Recovery Unit  
501 Sycamore st., Ste 400  
Waterloo, IA 50703-4651

Credit Solutions, LLC  
2277 Thunderstick Dr., Ste 400  
Lexington KY 40505-4878

Daniel R. Kelly, Esq.  
220 South Sixth Street  
Suite 2200  
Minneapolis MN 55402-4504

(p)H & R ACCOUNTS INC  
5320 22ND AVENUE  
MOLINE IL 61265-3627

Elizabeth R. Heilig  
Meredith Law Firm, LLC  
4000 Faber Place Drive  
Suite 120  
North Charleston, SC 29405-8585

Internal Revenue Service  
Centralized Insolvency Operations  
PO Box 7346  
Philadelphia PA 19101-7346

Iowa Department of Human Services  
Collection Services Center  
P.O. Box 9125  
Des Moines IA 50306-9125

Jeffrey J. Maleska, Esq.  
220 South Sixth Street  
Suite 2200  
Minneapolis MN 55402-4504

John and Courtnei Wicker  
2912 Mineral Springs  
Schertz, TX 78108-3487

Kannegiesser ETECH, Inc.  
2090 SE Elm St.  
Minneapolis MN 55414-2531

MUSC Health  
1 Poston Road Suite 350  
Charleston SC 29407-3431

Meredith Law Firm, LLC  
4000 Faber Place Drive  
Suite 120  
North Charleston SC 29405-8585

Milissa Mccombs  
2931 50th Avenue SE  
Rochester MN 55904-9039

Perdue Brandon FielderCollins & Mott LLP  
P.O. Box 817  
Lubbock TX 79408-0817

Pinnacle Credit Services, LLC  
Resurgent Capital Services  
PO Box 10587  
Greenville, SC 29603-0587

Roper St. Francis Physicians  
PO Box 650292  
Dallas TX 75265-0292

SC Department of Revenue  
PO Box 12265  
Columbia SC 29211-2265

South Carolina Sleep Medicine  
92 Springview Lane  
Summerville SC 29485-8153

Synchrony/Ashley Furniture Homestore  
Attn: Bankruptcy  
Po Box 965060  
Orlando FL 32896-5060

Telecom Self-reported  
Po Box 4500  
Allen TX 75013-1311

US Trustee's Office  
Strom Thurmond Federal Building  
1835 Assembly Street  
Suite 953  
Columbia, SC 29201-2448

USAA Federal Savings Bank  
Attn: Bankruptcy  
10750 McDermott Freeway  
San Antonio TX 78288-1600

Walker County JP3  
2986a Sh19 S.  
Huntsville TX 77320

Wells Fargo Bank, N.A.  
Wells Fargo Card Services  
PO Box 10438, MAC F8235-02F  
Des Moines, IA 50306-0438

Wells Fargo Bank, NA  
PO Box 6995  
Portland OR 97228-6995

James M. Wyman  
PO Box 997  
Mount Pleasant, SC 29465-0997

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Americollect, Inc  
1851 S. Alverno Rd.  
Manitowoc WI 54221

H&R Accounts  
5320 22nd Avenue  
Moline IL 61266

End of Label Matrix	
Mailable recipients	36
Bypassed recipients	0
Total	36